

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

Eugene Uritsky

Debtor.

Chapter 11

Case No. 20-13659-amc

**DEBTOR'S RESPONSE TO THE UNITED
STATES TRUSTEE'S MOTION TO DISMISS**

The Debtor, through his undersigned counsel, submits this Response to the United States Trustee's Motion to Dismiss Case (the "Motion") and in support thereof states as follows:

1. The Debtor filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") on September 10, 2020 (the "Petition Date").

2. The Debtor filed his Schedules and Statements on October 08, 2020.

3. Since the filing his Petition, the Debtor has provided the United States Trustee with proof of car insurance, homeowner's insurance and a debtor-in-possession bank account. A copy of a check identifying the Debtor's debtor-in-possession account at TD Bank is attached Exhibit "A." A copy of a the homeowner's insurance policy is attached Exhibit "B."

4. The Debtor has requested that his homeowner's insurance company list the United States Trustee as a notice party. A copy of the Debtor's email to the insurance company making that request is attached as Exhibit "C."

5. The Debtor 's home is located at 29 Beverly Hills Drive, Warminster, PA (the "Property").

6. The Debtor filed his petition to maximize the value of the Property for the benefit of his creditors and all parties in interest. The Property is quite unique. It was built in 1989 for Joan Rivers and her husband. *See* Exhibit "D," an article discussing the history and marketing of

the Property.

7. The Debtor has been interviewing real estate brokers and made the determination yesterday to continue with the real estate broker he had been working with prior to the Petition Date. The Debtor will be filing a Motion to Employ the Real Estate Broker within the next two business days, if not sooner.

8. According to the real estate broker, the Property is worth between \$1,850,000 and \$2,000,000. *See* Exhibit “E,” Declaration of Christopher Hvostal.

9. The Debtor’s pre-petition efforts to market the Property were, and continue to be, seriously impacted by the COVID-19 pandemic. Nevertheless, the real estate broker has been in contact with approximately six potential buyers who have expressed an interest in purchasing the Property in the range of \$2,000,000.00. *See id.*

10. The Debtor owes approximately \$1,700,000 on his mortgage and has approximately \$55,000 of unsecured debt. Should the Property sell within the price range of \$1,850,000 to \$2,000,000, all the Debtor’s creditors’ claims would be paid in full.

WHEREFORE, the Debtor respectfully requests the Court enter an Order denying the Motion of the United States Trustee to Dismiss the Case and for such other relief as is just and appropriate.

Dated October 14, 2020

JENSEN BAGNATO P.C.

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